

Mr. Mike O'Herron
2705 Spurgin Road
Missoula, MT 59804

Dear Mr. O'Herron,

I am writing in regards to DNRC's Habitat Conservation Plan and Final Environmental Impact Statement. DNRC's state trust lands include habitat that is critical to the future of the grizzly bear, an animal whose health is a measure of the integrity of the ecosystems where they live. The EIS would exacerbate already existing problems of excessive roading, and would further shrink the small, scattered and isolated core habitat. All alternatives would increase the number of roads in already heavily roaded areas.

Further, in all alternatives, DNRC, without biologically sound justification, abandons tried and true bear conservation approaches, in which fixed secure areas are protected. This approach has proven to provide effective refugia for bears, especially females. Instead, DNRC has chosen a new system of rotating and temporarily protecting "quiet areas", while logging and roading occur nearby. Research has demonstrated that grizzly bears, especially females with cubs, are particularly cautious and less likely to use areas that have been recently filled with the din of human activity, including chainsaws and trucks.

Please reconsider the plan and revise it to meet the stated standard of protecting endangered species "to the maximum extent practicable." In the case of the grizzly, this means that DNRC would:

1. Increase protections for core areas, rather than allow them to shrink in all alternatives.
2. Decrease total and open road densities through strategic road restoration efforts that target the best remaining habitat and expand the size of core secure areas.
3. Provide much stronger protections for state lands in the Cabinet Yaak, where grizzly bears are teetering on the brink of extinction.
4. Reduce the timeframe of the plan from 50 years to 10-15 years, which is more realistic and practical -- and similar to what is done on nearby national forests. It is not possible to reasonably project the future of grizzly habitat, including the location of key bear foods, fifty years from now, especially given the pace of human development and climate change.

Please note that NRDC's concerns are corroborated by the Environmental Protection Agency, which also told the state that road densities in the plan are too high and the timeframe for the plan is too long.

I appreciate the opportunity to submit this comment letter. Please keep me apprised of developments on this plan.

Sincerely,